Paul Carlos Southwick (OSB 095141) Religious Exemption Accountability Project Paul Southwick Law, LLC

8532 N. Ivanhoe St. #208 Portland, OR 97203

Email: paul@paulsouthwick.com

Phone: 503-806-9517

Alletta S. Brenner (OSB 142844) Perkins Coie LLP

1120 N.W. Couch Street, Tenth Floor

Portland, Oregon 97209-4128 Email: ABrenner@perkinscoie.com

Phone: 503-727-2000

Timothy R. Volpert (OSB 814074) Tim Volpert PC

2111 NE Hancock St. Ste. 2B

Portland, OR 97212

Email: tim@timvolpertlaw.com

Phone: 503-703-9054

Misha Isaak (OSB 086430) Perkins Coie LLP

1120 N.W. Couch Street, Tenth Floor Portland, Oregon 97209-4128

Email: misaak@perkinscoie.com

Phone: 503-727-2000

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

Elizabeth HUNTER; et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION; and Catherine LHAMON, in her official capacity as Assistant Secretary for the Office of Civil Rights, U.S. Department of Education,

Defendants,

v.

COUNCIL FOR CHRISTIAN COLLEGES & UNIVERSITIES, WESTERN BAPTIST COLLEGE d/b/a CORBAN UNIVERSITY, WILLIAM JESSUP UNIVERSITY AND PHOENIX SEMINARY,

Intervenor-Defendants.

Case No. 6:21-cv 00474-AA

DECLARATION OF PAUL CARLOS SOUTHWICK

I, Paul Carlos Southwick, declare:

- 1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
- 2. Attached as Exhibit A is OCR Letter re: Lincoln Christian University Investigation (January 7, 2022).
- 3. Attached as Exhibit B is OCR Email Correspondence re: Lincoln Christian University Investigation (January 10, 2022)

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 10th day of January, 2022.

By: s/Paul Carlos Southwick
Paul Carlos Southwick